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ENVIRONMENTAL PRIORITIES INITIATIVE
PRELIMINARY ASSESSMENT

Purpose: RCRA Preliminary Assessment

Site: MacDermid Incorporated
5439 San Fernando Road West
Los Angeles, California
Los Angeles County

Site EPA ID Number: CAD010707222

TDD Number: F9-9008-068

Program Account Number: FCA1587RAA

FIT Investigators: Robert Easley
Paul Brown

Date of Inspection: October 18, 1990

Report Prepared By: Robert Easley RE

Report Date: January 30, 1991

FIT Review/Concurrence: James M. James 1-24-91

Submitted To: Rachel Loftin,
Site Assessment Manager,
EPA Region IX

ecology and environment, inc.
160 SPEAR STREET, SAN FRANCISCO, CALIFORNIA 94105, TEL. 415/777-2811
International Specialists in the Environment

1. INTRODUCTION

As part of its Environmental Priorities Initiative (EPI) program, the U.S. Environmental Protection Agency (EPA) has requested Ecology and Environment, Inc.'s Field Investigation Team (E & E FIT) to conduct a Preliminary Assessment (PA) of MacDermid Incorporated, located at 5439 West San Fernando Road, Los Angeles, California.

The EPI program integrates the Resource Conservation and Recovery Act of 1976 (RCRA) as amended by the 1984 Hazardous and Solid Waste Amendments (HSWA) with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA) in order to set priorities for cleanup of the most environmentally significant sites first. The Preliminary Assessment is conducted using CERCLA revised Hazard Ranking System (rHRS) criteria to determine the site's eligibility for inclusion on the National Priorities List and, thus, to prioritize facilities for the RCRA program.

2. SITE DESCRIPTION

2.1 SITE LOCATION AND OWNER/OPERATOR HISTORY

The MacDermid Incorporated site is located at 5439 San Fernando Road West in Los Angeles, California (Township 1 North, Range 13 West, Section 20, San Bernardino Base Line and Meridian; Latitude: 34° 09′ 15", Longitude: 118° 16′ 18"). The site is situated in a light industrial area bordered on the east by the city of Glendale and on the west by Griffith Park. The Los Angeles River is located approximately 0.3 miles west of the site (see Figure 2-1) (1).

The 0.5-acre site consists of a building, a shipping and receiving area, and a small parking lot (see Figure 2-2). The building is roughly divided into the following areas: an office, a warehouse, and a laboratory. Most of the site warehouses massive volumes of specialty chemicals produced by MacDermid's other facilities (2). MacDermid, headquartered in Connecticut, manufactures and distributes chemicals used by the metal finishing and printed circuit board industry (3). Sunland Chemical and Research Company (Sunland) (EPA ID# CAD008261059) operates adjacent to the MacDermid site. Mr. Dadone, president of Sunland, bought the MacDermid site property in 1973 and has leased it to MacDermid since 1975. Prior to 1975 the site consisted of a vacant, paved lot. During this time Sunland stored hazardous materials in a 432-square foot area on site (4). Also operating immediately adjacent to MacDermid are Cort Furniture Rental as well as two machine shops, G.K. Hughes Company and Chuck Belott Company (see Figure 2-2) (5).

2.2 FACILITY PROCESSES/WASTE MANAGEMENT

2.2.1 HISTORICAL

From 1973 to 1975 Sunland used a portion of the vacant paved lot to store hazardous materials. From 1975 to 1985, MacDermid stored and distributed chemicals used by the metal finishing and printed circuit board industry (5).

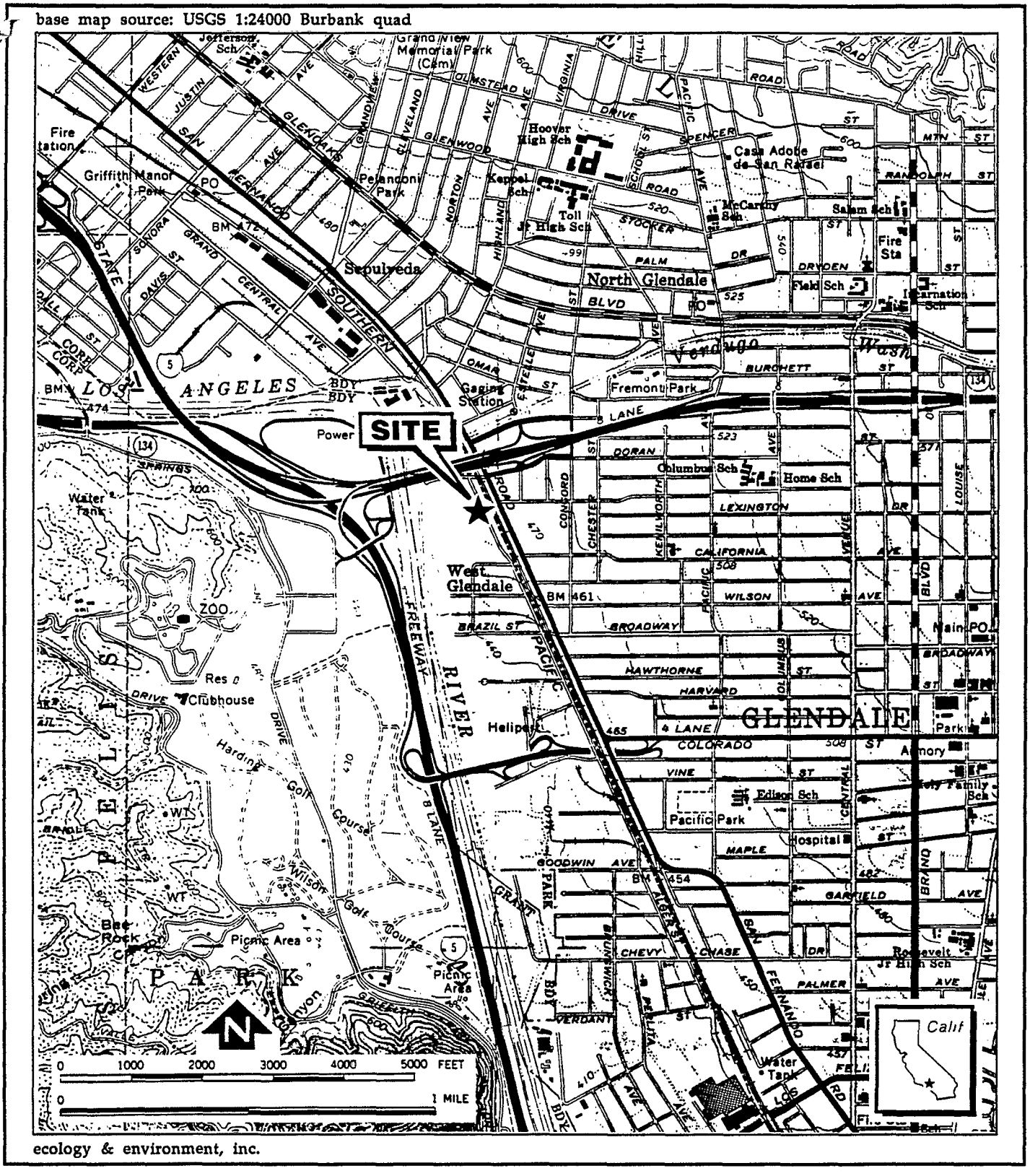

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Figure 2-1

SITE LOCATION -- MacDERMID INCORPORATED

5439 San Fernando Road West
Los Angeles, CA

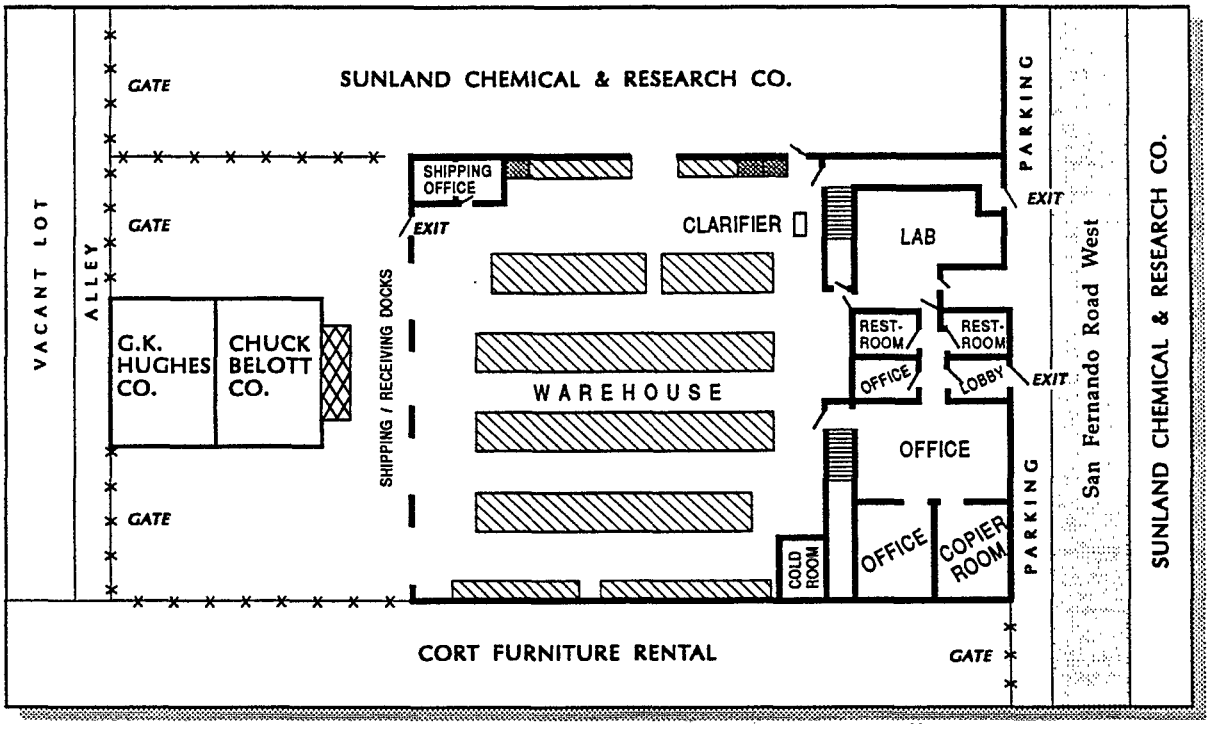

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Figure 2-2

FACILITY MAP -- MacDERMID INCORPORATED

5439 San Fernando Road West
Los Angeles, CA

Customers that purchased MacDermid's products returned the spent materials back to MacDermid. MacDermid, acting as a transfer station, would then send the spent materials to either Sunland or Southern California Chemical Company (EPA ID # CAD008488025) for recycling. The hazardous wastes stored at MacDermid for later recycling primarily consisted of alkaline etchants, chromic acid solutions, and solder strippers and solder conditioners. According to MacDermid, it never treated or recycled these hazardous wastes on site. As of December 1985, MacDermid stopped receiving and storing hazardous wastes from off-site sources. Instead, the recyclable materials are sent directly to Southern California Chemical Company and Sunland (6).

2.2.2 CURRENT

Currently the MacDermid site acts as a warehouse and distribution center for virgin chemicals produced by MacDermid's other facilities. The chemicals produced by MacDermid are primarily used by the metal finishing and printed circuit board industry. Two waste streams are currently generated on site by MacDermid: laboratory wastes and floor wastes. Laboratory wastes are generated as a result of MacDermid's other business activity at the site - the testing of waste streams for MacDermid's clients. MacDermid has analyzed waste streams, mostly for metal content, since 1975. The laboratory wastes, consisting mostly of heavy metal solutions, are primarily the samples leftover after laboratory analysis. The floor wastes generated on site are a result of small spills which occur on site. Most of these wastes are stored in 55-gallon drums on site for less than 90 days. Chemical Waste Management (EPA ID# CAT000646117) and Martin Industrial Pumping (EPA ID# CAD000628636) are the certified hazardous waste transporters which remove MacDermid's waste from the site (6).

Acid wastes from MacDermid's lab drain from the lab into a clarifier. The outlet pipe of the clarifier has an electric pH meter and Sunland and the local sanitation department collect monthly samples. Sunland has a permit with the Los Angeles Bureau of Sanitation and according to MacDermid this permit includes the usage by MacDermid (6,7).

3. REGULATORY INVOLVEMENT

MacDermid submitted Part A of a hazardous waste facility permit application in October 1981. According to MacDermid, it notified EPA in 1987 that it has submitted a closure plan for the storage of hazardous wastes to the California Department of Health Services (DHS). EPA still classifies the MacDermid site as a RCRA hazardous waste storage facility operating under interim status (5).

DHS issued an Interim Status Document (ISD) to MacDermid on November 10, 1981 for the storage of hazardous wastes. Since the issuance of the ISD, DHS has conducted numerous inspections of the MacDermid facility. As a result of the inspections, DHS has issued MacDermid several notices of violations. RCRA violations by MacDermid included the following: no copy of personnel training program/records available for review; no copy of the contingency plan available; no emergency coordinator designated at the facility; no copy of the ISD or biennial report on file at the

facility. MacDermid has responded to each of these violations. MacDermid has never submitted Part B of a hazardous waste facility permit application (Operations Plan). Instead MacDermid submitted a closure plan on December 14, 1986 to DHS for the storage of hazardous waste and resubmitted the closure plan on April 10, 1987 (8). According to MacDermid it has sent letters to DHS reconfirming its desire to remove its designation as a storage facility and become a generator only. DHS has not approved MacDermid's closure plan (5). It should be noted that MacDermid claims it has never stored hazardous wastes on site for more than 90 days (3).

No other regulatory agencies have been involved with the site. MacDermid does not have any permits with the Regional Water Quality Control Board (RWQCB) or the South Coast Air Quality Management District (5,9).

Sunland has a permit with the County of Los Angeles Bureau of Sanitation for the discharge of waste into the city sewer via a clarifier (7). According to MacDermid, this permit includes the use of the clarifier by MacDermid (6).

The MacDermid site lies within the boundaries of the Crystal Springs NPL site, which is one of four NPL study areas in the San Fernando Valley Groundwater Basin. The Crystal Springs NPL site encompasses the southeastern portion of the San Fernando Valley Groundwater Basin, an area of known groundwater contamination problems. Currently the Los Angeles Department of Water and Power has entered a cooperative agreement with EPA to complete a Remedial Investigation of the Crystal Springs NPL site (10).

4. DESCRIPTIONS OF INDIVIDUAL SOLID WASTE MANAGEMENT UNITS

Distinct Solid Waste Management Units (SWMUs) have been identified to evaluate potential on-site sources of releases to air, surface water, groundwater, soil, and subsurface gas. A SWMU is defined as any discernible waste management unit at a facility from which hazardous constituents might migrate, irrespective of whether the unit was intended for the management of solid and/or hazardous waste. As a result of this Preliminary Assessment FIT has identified three SWMUs at the site. Additional SWMUs may exist.

4.1 OUTSIDE HAZARDOUS WASTE STORAGE AREA

Unit Description

From 1973 to 1975 Sunland stored hazardous materials outside on a paved lot in an area encompassing approximately 432 square feet. This area was surrounded by a 3-foot high brick wall. No other secondary containment features were implemented. From 1975 to 1987 MacDermid stored hazardous wastes in this same outside area (4,5).

Date of Start-up

Sunland stored hazardous materials in the outside area from 1973 to 1975 and MacDermid stored hazardous wastes outside from 1975 to 1987 (6). On November 10, 1981 MacDermid received an Interim Status Document to store hazardous wastes on site for more than 90 days (8).

Date of Closure

Hazardous wastes are no longer stored in the outside storage area. MacDermid ceased storing hazardous wastes outside in 1987 (5,6).

Waste Managed

In the outside storage area, MacDermid primarily stored waste generated by the electronics industry. These wastes included acids, alkaline solutions, cyanide, and heavy metals such as copper, nickel, lead, and chromium (3). Sunland stored a wide variety of its hazardous materials in the outside storage area. The exact materials that Sunland stored in this outside storage area is not known, but Sunland claims it is the same materials that Sunland currently sells to MacDermid (4).

Release Controls

Except for a 3-foot high brick wall, no secondary containment features were implemented when the hazardous wastes were stored outside (6).

History of Releases

No releases of hazardous wastes have been documented on site (5,6).

4.2 INSIDE HAZARDOUS WASTE STORAGE AREA

Unit Description

Since 1987 MacDermid has stored its hazardous wastes inside its warehouse in two small areas. The storage areas consist of hazardous wastes stored in 55-gallon drums and placed on top of wooden platforms. The hazardous wastes are stored on the concrete floor in two separate areas encompassing a combined surface area of approximately 200 square feet (6).

Date of Start-up

From 1987 to the present MacDermid has stored hazardous wastes inside its building (3,5).

Date of Closure

MacDermid submitted a closure plan to DHS on December 14, 1986. The closure plan has not yet been approved by DHS or EPA. Currently, MacDermid stores hazardous wastes inside its warehouse for less than 90 days (3).

Waste Managed

In the inside storage areas, MacDermid primarily stores waste generated by the electronics industry. These wastes included acids, alkaline solutions, cyanide, and heavy metals such as copper, nickel, lead, and chromium (3).

Release Controls

Currently, MacDermid stores hazardous wastes inside its warehouse in sealed containers placed on top of wooden platforms. MacDermid stores all hazardous wastes at floor level. No concrete berms or other methods of secondary containment have been implemented at the site (6).

History of Releases

No releases of hazardous materials have been documented on site (5,6).

4.3 CLARIFIER

Unit Description

MacDermid's acidic wastewaters drain from the laboratory into a plastic-lined, concrete, three stage clarifier. Each compartment is approximately 80 cubic feet (4,6).

Date of Start-up

MacDermid and Sunland began using the clarifier circa 1986 (4).

Date of Closure

The clarifier is still active (4,6).

Waste Managed

MacDermid discharges acidic wastewaters into the clarifier from its laboratory (4,6). These wastewater may contain dilute solutions of heavy metals such as nickel and cadmium.

Release Controls

The clarifier has a plastic lining and a pH meter contantly monitors the outlet pipe of the clarifier. The local sanitation department and Sunland collect monthly samples from the clarifier (4).

History of Releases

No releases from the clarifier to the underlying soils have been documented (5,6).

5. HRS FACTORS

The revised Hazard Ranking System (rHRS) is a scoring system used to assess the relative threat associated with actual or potential releases of hazardous substances from sites. It is the principal mechanism EPA uses to place sites on the National Priorities List (NPL). FIT has evaluated the following rHRS factors relative to this site.

5.1 WASTE TYPE AND QUANTITY

MacDermid manufactures chemicals used by the metal finishing and printed circuit board industry. MacDermid has stored the following hazardous wastes at the site in the past: 1,6-hexanol, copper solutions, copper cyanide solutions, chromic acid solutions, acid copper solutions, tin/lead solutions, nickel solutions, chrome-soda ash solid, sodium bisulfate-ammonium persulfate solid, copper-formaldehyde absorbent solid, alkaline etchants containing copper chloride, and xylene (2). The volume of hazardous wastes that MacDermid stores on site has decreased since it stopped receiving recyclable hazardous wastes from off-site sources. For example, in 1980 MacDermid stored approximately 400,000 gallons of hazardous waste solutions and 300,000 pounds of cupric chloride on site. MacDermid generated only 9,800 pounds of hazardous waste on site in 1988 and currently generates approximately 7,000 pounds of hazardous waste per year. MacDermid currently stores hazardous wastes in two small areas inside its warehouse which encompass a total of 200 square feet (5,6).

MacDermid also stores products on site which contain hazardous substances. Many of these products contain the following chemicals: sodium hydroxide, chromic acid, sodium chromate, hydrochloric acid, sulfuric acid, cyanide, methanol, isopropyl alcohol, nitric acid, ethylenediamine, toluidine, ammonia, acetic acid, tellurium, butyl acetate, formaldehyde, formic acid, hydrogen peroxide, copper salts, stannous chloride, caustic potash, nickel chloride, hydroxybenzoic acid (2).

5.2 GROUNDWATER

The site is located in the eastern portion of the San Fernando Valley Groundwater Basin. The San Fernando Valley Groundwater Basin is an unconfined alluvial basin primarily composed of sands and gravels interbedded with thin intermittent silt and clay layers. Alluvial deposits in the eastern portion of the San Fernando Valley Groundwater Basin are characterized by high soil permeability and groundwater production (11). Beneath the site groundwater is first encountered at depths ranging from 30 to 80 feet below ground surface (bgs). Groundwater beneath the site flows toward the southeast, although nearby municipal wells have created localized cones of depression (11). The closest drinking water wells to the site are approximately 1 mile northwest of the site and are part of the Grandview well field. Water from these wells is blended with surface water in a reservoir and is part of a system that serves 160,000 people in Glendale (12). In addition, several wells located approximately 3.5 miles from the site provide drinking water to the city of Los Angeles. Groundwater from the San Fernando Valley Groundwater Basin provides approximately 15% of the

drinking water to the city of Los Angeles (13).

Groundwater near the site has been contaminated with volatile organic chemicals (VOCs) such as trichloroethene (TCE) and tetrachloroethene (PCE). Several City of Glendale municipal wells have been taken out of service due to TCE and PCE contamination (11). The site is not believed to have ever stored VOCs on site, thus the site is not a likely contributor to groundwater contamination (5,6).

The net precipitation at the site is approximately 6.5 inches (14,15).

The site has a moderate potential for a release to groundwater for the following reasons: no methods of secondary containment of hazardous waste on site, shallow depth to groundwater, and no confining or continuous clay layers protecting the lower aquifers (6,11,12).

5.3 SURFACE WATER

The Los Angeles River, located 0.3 miles west of the site, is the closest surface water body to the site (1). The Los Angeles River is a concrete-lined flood control channel and does not support any sensitive environments in the immediate area (16,17). The Los Angeles River is not used as a source of drinking water and does not support any fisheries. The potential for a release of hazardous substances to surface water is moderate since no methods of secondary containment have been implemented at the site to contain the hazardous wastes (6).

5.4 AIR

The potential for a release from this site to air is low since hazardous wastes are stored in intact, sealed, 55-gallon drums inside the MacDermid building (5). The population distribution within 4 miles of the site is presented in Table 5-1 (18).

5.5 SOIL EXPOSURE

The site has a low potential for an exposure from contaminated soil since hazardous wastes are stored in sealed drums inside the MacDermid building. In addition, the MacDermid building has a security system which would prevent public access to MacDermid's hazardous wastes. Since the site is paved, no potentially contaminated soils are available for exposure (6).

Table 5-1

Population Distribution Within 4 Miles of the Site

Distance (miles)	Population*
On-site	15
0 - 0.25	1,516
0.25 - 0.5	5,368
0.5 - 1.0	16,782
1.0 - 2.0	53,420
2.0 - 3.0	70,695
3.0 - 4.0	113,107

* Population includes workers

6. SUMMARY OF FIT INVESTIGATIVE ACTIVITIES

6.1 AGENCIES CONTACTED

FIT contacted DHS and completed a file search for the MacDermid facility. No other information was available regarding the MacDermid facility from the following agencies: the Regional Water Control Board, the South Coast Air Quality Management Division, and the Los Angeles Bureau of Sanitation (5,7,9).

6.2 RECONNAISSANCE OBSERVATIONS

FIT met with Mr. Bob Tice of MacDermid for a site reconnaissance on October 18, 1990. Mr. Tice gave FIT a tour of the site after a brief interview by FIT. During the tour FIT was shown MacDermid's laboratory, warehouse, and shipping and receiving area. MacDermid has two small hazardous waste storage areas inside the warehouse. Most of the warehouse stores massive volumes of MacDermid's products for later distribution (6).

7. EMERGENCY RESPONSE CONSIDERATIONS

No emergency response action appears necessary at this site. MacDermid appears to have its hazardous wastes well contained in sealed containers. In addition, hazardous wastes are stored inside the MacDermid building, which is not accessible to the public.

8. SUMMARY OF rHRS CONSIDERATIONS

The MacDermid Incorporated site is located at 5439 San Fernando Road West in Los Angeles, California. The site is located in an industrial area which is bordered on the east by the city of Glendale and on the west by Griffith Park. Mr. Serge Dadone, president of Sunland Chemical and Research Company (Sunland), has owned the site since 1973 and built the MacDermid building in 1975. The site consisted of a vacant, paved lot from 1973 to 1975 and Sunland stored hazardous materials in a small area on site during this time. From 1975 to 1985 MacDermid acted as a transfer station for hazardous wastes generated by the electronics industry. Currently, the site acts as a warehouse and distribution center for specialty chemicals used in the electronics industry.

MacDermid submitted a closure plan to the California Department of Health Services (DHS) on December 14, 1986 and has sent several letters to DHS and the U.S. Environmental Protection Agency (EPA) since then reconfirming its desire to remove its designation as a hazardous waste storage facility. Neither DHS or EPA has approved MacDermid's closure plan.

No observed release of hazardous materials from this site to air, surface water, or groundwater has been documented. Hazardous materials are stored in sealed drums inside a warehouse.

The significant factors of the revised HRS associated with this site are:

- o moderate potential for a release to groundwater due to interconnection of the lower and upper aquifers and lack of secondary containment features for the hazardous waste storage areas;
- o groundwater blended with imported surface water is a source of drinking water for a large population;
- o small apparent waste quantity;
- o low potential for a release to air;
- o low potential for soil exposure; and
- o surface water not used for drinking water or as a habitat for fish or any threatened or endangered species.

9. EPA RECOMMENDATION

	Initial	Date
No Further Remedial Action Planned under CERCLA	[illegible]	2/6/91
Higher-Priority SSI under CERCLA		
Lower-Priority SSI under CERCLA		
Defer to Other Authority (e.g., RCRA, TSCA, NRC)		

Notes:

This site is being reviewed under the RCRA program.

10. REFERENCES

1. U.S. Geological Survey, maps of Burbank and Pasadena, California, 7.5-minute quadrangles, 1966 (photorevised 1972).

2. MacDermid Incorporated, "Fact Sheet," prepared by Bob Tice for Ecology and Environment, Inc.'s, Field Investigation Team (E & E FIT), October 1990.

3. McKesson Environmental Services, Inc., "Closure Plan, MacDermid Incorporated - Draft," December 1986.

4. Dadone, Serge, Sunland Chemical, and Robert Easley, E & E FIT, telephone conversation, October 17, 1990, December 28, 1990, and January 23, 1991.

5. Tice, Robert, MacDermid Incorporated, and Robert Easley, E & E FIT, telephone conversation, November 20, 1990 and December 28, 1990.

6. Easley, Robert, E & E FIT, Site Reconnaissance Interview and Observations Report of the MacDermid Incorporated site, Los Angeles, California, October 18, 1990.

7. Cruz, Patty, Bureau of Sanitation, and Robert Easley, E & E FIT, telephone conversation, January 18, 1991.

8. California Department of Health Services, "Inspection Report on MacDermid Incorporated," prepared by Javier Hinojosa, December 14, 1988.

9. Au, Jenny, Los Angeles Regional Water Quality Control Board, and Robert Easley, E & E FIT, telephone conversation, January 18, 1991.

10. James M. Montgomery, Consulting Engineers, Inc., "Executive Summary, Technical Memorandum for the Phase I Crystal Springs Vertical Profile Borings," August 1990.

11. City of Los Angeles, Department of Water and Power, "Groundwater Quality Management Plan, San Fernando Valley Basin," July 1, 1983.

12. Cruz, Nick, City of Glendale Public Works Department, and Robert Easley, E & E FIT, telephone conversation, September 27, 1990.

13. King, Jim, Los Angeles Department of Water and Power, and Robert Easley, E & E FIT, telephone conversation, December 21, 1990.

14. Federal Register, Vol. 53, No. 247, Proposed rules, 52029-52030, December 23, 1988.

15. U.S. Department of Commerce, National Oceanic and Atmospheric Administration, National Environmental Satellite Data and Information Service, National Climatic Data Center, Comparative Climatic Data for the United States Through 1985, Nashville, TN.

16. Dibble, Steve, Army Corps of Engineers, and Howard Edwards, E & E FIT, telephone conversation, April 9, 1990.

17. California Department of Fish and Game, Natural Diversity Data Base, Pasadena, Burbank, Hollywood, and Los Angeles Quadrangles, April 1, 1989.

18. U.S. Environmental Protection Agency, Office of Toxic Substances, Graphical Exposure Modeling System, March 1989.

APPENDIX A

CONTACT LOG AND REPORTS

CONTACT LOG

Facility Name: MacDermid Incorporated
Facility ID: CAD010707222

Name	Affiliation	Phone #	Date	Information
Steve Dibble	Army Corps of Engineers	213-894-0220	4/09/90	See Contact Report.
Satish Gulati	DHS, Burbank	818-567-3128	9/25/90	See Contact Report.
Robert Tice	MacDermid	818-240-9573	9/26/90	See Contact Report.
Nancy Waters	Burbank, Public Works Department	818-953-9647	9/26/90	See Contact Report.
Nick Cruz	Glendale, Public Works Department	818-956-3962	9/27/90	See Contact Report.
Nick Cruz	Glendale, Public Works Department	818-956-3962	9/28/90	See Contact Report.
Victor Vargas	L.A. Dept of Water and Power	213-481-6857	10/9/90	See Contact Report.
Robert Tice	MacDermid	818-240-9573	10/16/90	See Contact Report.
Serge Dadone	Sunland Chemical	213-245-7688	10/17/90	See Contact Report.
Robert Tice	MacDermid	818-240-9573	10/18/90	See Site Reconnaissance Interview and Observations Report.
Robert Tice	MacDermid	818-240-9573	11/20/90	See Contact Report.
Nick Cruz	City of Glendale	818-548-3962	12/19/90	See Contact Report.
Jim King	L.A Dept. of Water and Power	213-481-3151	12/21/90	See Contact Report.

re/mac/clcr

CONTACT LOG (continued)

Serge Dadone	Sunland Chemical	213-245-7688	12/28/90 1/23/91	See Contact Report.
Robert Tice	MacDermid	818-240-9573	12/28/90 1/23/91	See Contact Report.
Patty Cruz	Bureau of Sanitation	213-485-5886	1/18/91	According to Ms. Cruz, MacDermid does not have a discharge permit but Sunland Chemical does have a permit to discharge industrial waste.
Jenny Au	RWQCB, Underground Tank Unit	213-266-7579	1/18/91	RWQCB does not have any file information for the MacDermid site.
Avigale Martinez	RWQCB, Underground Tank Unit	213-266-7611	1/22/91	RWQCB does not have any file information for the MacDermid site.

re/mac/clcr

CONTACT REPORT

AGENCY/AFFILIATION: Army Corps of Engineers		
DEPARTMENT:		
ADDRESS/CITY: Los Angeles		
COUNTY/STATE/ZIP:		
CONTACT(S)	**TITLE**	**PHONE**
1. Steve Dibble		213-894-0220
2.		
E & E PERSON MAKING CONTACT: Howard Edwards		**DATE:** 4/09/90
SUBJECT: Los Angeles River		
SITE NAME: MacDermid Incorporated		**EPA ID#:** CAD010707222

The Los Angeles River is a concrete-lined flood control channel. It is dry except when it rains or when storm drains empty into it. There may be bicycle paths on it.

re/mac/clcr

CONTACT REPORT

AGENCY/AFFILIATION: Department of Health Services		
DEPARTMENT: File Room		
ADDRESS/CITY: West San Fernando, Burbank		
COUNTY/STATE/ZIP: Los Angeles County, CA		
CONTACT(S)	**TITLE**	**PHONE**
1. Satish K. Gulati	File Coordinator	818-567-3128
2.		
E & E PERSON MAKING CONTACT: Robert Easley		**DATE:** 9/25/90
SUBJECT: File information		
SITE NAME: MacDermid Incorporated		**EPA ID#:** CAD010707222

Mr. Satish Gulati said DHS has a large file on MacDermid. We set up a file review for Monday, October 1, 1990 at 2:00.

re/mac/clcr

CONTACT REPORT

AGENCY/AFFILIATION: MacDermid Incorporated		
DEPARTMENT:		
ADDRESS/CITY: 5439 San Fernando Road West, Los Angeles		
COUNTY/STATE/ZIP: Los Angeles County, CA 90039		
CONTACT(S)	**TITLE**	**PHONE**
1. Robert Tice	Operations Manager	818-240-9573
2.		
E & E PERSON MAKING CONTACT: Robert Easley		**DATE:** 9/26/90
SUBJECT: Site information		
SITE NAME: MacDermid Incorporated		**EPA ID#:** CAD010707222

9/26/90

According to Mr. Tice, MacDermid has obtained a RCRA permit for the storage of acids and heavy metals in 1981. However, Mr. Tice said MacDermid has not stored hazardous waste on site for the last three or four years. MacDermid currently generates approximately 7,000 pounds of hazardous waste per year. The hazardous waste generated on site is removed from the site by a certified hazardous waste management firm within 90 days. The MacDermid facility at 5439 San Fernando Road currently acts as a warehouse distribution center for the other MacDermid facilities. This facility also has a laboratory for testing the wastestreams of electroplating facilities, chrome plating facilities, and printed circuit board manufacturers. The laboratory primarily tests the wastestreams for heavy metals and does not use solvents in its operations. Several years ago, MacDermid received spent etchants and transferred them to Southern California Chemical for recycling. Before Southern California Chemical, Sunland Chemicals received the etchants. Mr. Tice does not know if any other companies occupied the site before MacDermid.

10/16/90

MacDermid stopped receiving spent plating baths for later recycling in 1986. Currently the only waste generated on site by MacDermid is the plating bath solutions remaining after MacDermid has analyzed them and the waste from small spills on site. Mr. Tice does not believe MacDermid has ever used the clarifier located beneath its building. MacDermid does not have any permits nor ever has had any permits with the South Coast Air Quality Management Division or the Regional Water Quality Control Board.

re/mac/clcr

11/20/90

According to Mr. Tice, from 1975 to 1987 MacDermid stored its hazardous wastes outside its building on the pavement. This hazardous waste storage area was approximately 12 feet long and 36 feet wide and was surrounded by a 3-foot high brick wall. Sunland Chemical and Research Company stored hazardous materials in the same area before MacDermid started operation in 1975. During this time the site consisted of a vacant (paved) lot. The laboratory and the weir on site have been in use since 1975. The two sheds behind the MacDermid warehouse are machine shops used by G.K. Hughes and Chuck Belot. These buildings are also owned by Serge Dadone.

12/28/90

Mr. Tice said that Cherrie Gillis, who works in the Connecticut office, first notified EPA of its hazardous waste facility closure plan in 1987. MacDermid buys over 50 different products from Sunland Chemical.

1/23/91

Concerning further clarification regarding the clarifier and the weir MacDermid uses, Mr. Tice said he is actualy not that familiar with the capicity and details of the clarifier and that Sunland Chemical handles or is responsible for the clarifier.

re/mac/clcr

CONTACT REPORT

AGENCY/AFFILIATION: City of Burbank		
DEPARTMENT: Public Works Department		
ADDRESS/CITY: Burbank		
COUNTY/STATE/ZIP: Los Angeles County, California		
CONTACT(S)	**TITLE**	**PHONE**
1. Nancy Waters		818-953-9647
2.		
E & E PERSON MAKING CONTACT: Robert Easley		**DATE:** 9/26/90
SUBJECT: Drinking water wells		
SITE NAME: MacDermid Incorporated		**EPA ID#:** CAD010707222

According to Ms. Waters, the city of Burbank receives all of its drinking water from the Colorado Aqueduct and no water from drinking water wells. Drinking water wells in Burbank were closed in June 1986 due to trichloroethene and tetrachloroethene contamination.

re/mac/clcr

CONTACT REPORT

AGENCY/AFFILIATION: City of Glendale		
DEPARTMENT: Department of Public Works		
ADDRESS/CITY: 119 North Glendale Avenue, Suite 600		
COUNTY/STATE/ZIP: Los Angeles County, CA 91206		
CONTACT(S)	**TITLE**	**PHONE**
1. Nick Cruz		818-956-3962
2.		
E & E PERSON MAKING CONTACT: Robert Easley		**DATE:** 9/27/90
SUBJECT: Groundwater use		
SITE NAME: MacDermid Incorporated		**EPA ID#:** CAD010707222

9/27/90

According to Nick Cruz, the city of Glendale receives 10 to 15% of its drinking water from wells in the city of Glendale. The nearest wells to the MacDermid facility are approximately 0.5 to 1.0 miles northwest of the site. These wells are part of the Grandview well field area. Further east of the site is the Glorietta well field. The Grandview well field draws water from the San Fernando Basin while the Glorietta well field draws water from the Verdugo Basin. Mr. Cruz said he would send a well location map for these Grandview wells included with static water levels for these wells. These wells are blended in a reservoir before serving 160,000 people in Glendale.

9/28/90

Mr. Cruz said according to the Watermaster Report, Water Service in the Upper Los Angeles River Area, groundwater flow near the Grandview well field is towards the southeast. Mr. Cruz also reminded FIT that areas of the San Fernando Basin are NPL sites.

12/19/90

According to Mr. Cruz, well water from the Glorietta and the Grandview well fields is pumped to different reservoirs which serve the city of Glendale. Mr. Cruz said the water extract data listed in the May 1990 report, Watermaster Service in the Upper Los Angeles River Area, is a good indication of the relative contribution of these well fields to the city of Glendale.

re/mac/clcr

For the Glorietta well field, only well #3, 4, and 6 were used in 1989. In 1989 there was a sufficient supply of surface water and so well water from these wells did not need to be pumped to the reservoir. Instead the well water from these wells was pumped to the "lower pressure zones" of the City of Glendale's water system. These lower pressure zones are basically pipelines which are used as a source of drinking water. This year well # 3 and 4 are being pumped to the reservoir. MMI listed in the May 1990 is the water gauge for the pipeline for these lower pressure zones.

Mr. Cruz has sent a well location map for the Grandview well field at the request of FIT. Well # 2, 11, and 15 are the active wells for the Grandview well field. Well # 1, 12, and 16 are standby wells and well # 6, 13, and 14 are inactive. Well # 13 and 14 are inactive due to electrical and motor failures and will probably be put back into service in the future. Well #6 has a collapsed casing and has been abandoned.

re/mac/clcr

CONTACT REPORT

AGENCY/AFFILIATION: City of Los Angeles		
DEPARTMENT: Department of Water and Power		
ADDRESS/CITY:		
COUNTY/STATE/ZIP:		
CONTACT(S)	**TITLE**	**PHONE**
1. Victor Vargas		213-481-6857
2.		
E & E PERSON MAKING CONTACT: Robert Easley		**DATE:** 10/9/90
SUBJECT: Groundwater use		
SITE NAME: MacDermid		**EPA ID#:** CAD010707222

Mr. Vargas said the nearest wells to the MacDermid site are the wells from the Crystal Springs well field. These wells are north of highway 134 along the L.A. River. These wells are currently inactive and Mr. Vargas is not sure why these wells are inactive. Two wells located near the intersection of Flower St. and Cleveland St. were active as recently as last year. Mr. Vargas suggested I call Kuno Lill (213-481-6231) to determine why these wells are inactive. When the Crystal Springs well field was active, water from the wells was blended in a reservoir with MWD and aqueduct water before being served to the public. Mr. Cruz could not give an accurate estimate of the number of people these wells serve since there are dozens of reservoirs in Los Angeles most of which are interconnected. Mr. Cruz suggested I call Debbie MacKay (213-481-6143) for a better estimate of the number of people these wells serve.

re/mac/clcr

CONTACT REPORT

AGENCY/AFFILIATION: Sunland Chemical and Research		
DEPARTMENT:		
ADDRESS/CITY: Los Angeles		
COUNTY/STATE/ZIP: Los Angeles, California		
CONTACT(S)	**TITLE**	**PHONE**
1. Serge Dadone	President, Sunland	213-245-7688
2.		
E & E PERSON MAKING CONTACT: Robert Easley		**DATE:** 10/17/90
SUBJECT: Possible previous site occupants		
SITE NAME: MacDermid Incorporated		**EPA ID#:** CAD010707222

10/17/90

Mr. Serge Dadone built and owns the MacDermid building. Mr. Dadone built the MacDermid building in 1975 and MacDermid has been the only occupant of the building.

12/28/90

Serge Dadone bought the propery that MacDermid is located at in 1973. The property was already paved when Mr. Dadone bought it and the pavement and some soils had to be removed when the MacDermid building was built. Sunland stored materials for dry mixing in the same outside storage area that MacDermid stored hazardous wastes. The chemicals that Sunland stored in this area included soda ash, sulfates, and alkaline products. Mr. Dadone said the products that were stored in this outside storage area were the same products that Sunland currently sells to MacDermid. Mr. Dadone said a sand blasting company and machine shops were already operating on the property when he bought it. A portion of a city dump may have been located near the site in the 1960s.

1/23/91

Mr. Dadone said that MacDermid does not have a weir or sump which receives wastewater from the laboratory and then drains into the clarifier. Rather, Mr. Dadone said that wastewaters from the lab drain directly into the clarifier which is located beneath MacDermid's building. In other words, it appears the weir identified by Mr. Tice during the site tour is a clarifier. Mr. Dadone said that MacDermid's lab only discharges water into the clarifier. The clarifier was installed during the construction of the lab in 1985. The clarifier is a

three stage clarifier or three compartment clarifier with each compartment approximately 3 x 3 x 9 ft. Mr. Dadone is not sure if these are the correct dimensions of the clarifier. The clarifier is concrete and lined with plastic. A pH meter is attached to the outlet pipe of the clarifier and the city sanitation department and Sunland both test the water in the clarifier for metals once or twice a month. Mr. Dadone said that sediment rarely, if ever, has to be removed from the clarifier.

re/mac/clcr

SITE RECONNAISSANCE INTERVIEW AND OBSERVATIONS REPORT

Ecology and Environment, Inc.		
Field Investigation Team (FIT)		
160 Spear Street, Suite 1400		
San Francisco, California 94105		
(415) 777-2811		
E & E PERSON(S) CONDUCTING INTERVIEW AND MAKING OBSERVATIONS:		
Robert Easley, Paul Brown, Jennifer Eberle		
FACILITY REPRESENTATIVE(S):	**TITLE:**	**PHONE:**
Bob Tice	Operations Manager	818-240-9573
SITE NAME: MacDermid Incorporated		**DATE:** 10/18/90
CITY/STATE: Los Angeles, California		**EPA ID#:** CAD010707222

The following information was obtained during the interview:

FIT met with Bob Tice of MacDermid Incorporated at 9:00 on October 18, 1990 for an interview. During the interview, Mr. Tice explained to FIT MacDermid's past and present hazardous waste management practices as well as MacDermid's facility processes. MacDermid currently employs 15 people. The facility has a security system consisting of an alarm.

MacDermid currently receives products from its other facilities nationwide and stores the products in its warehouse for later distribution to its clients. At its other facilities, MacDermid manufactures etchants and plating solutions for the printed circuit board industry. In the past, MacDermid received its clients' spent solutions and stored them on site for later recycling by either Sunland Chemical (Sunland) or Southern California Chemical. MacDermid stopped this process in 1987 and MacDermid's clients currently send recyclable wastes directly to Sunland or Southern California Chemical instead. Currently the site acts primarily as a warehouse and distribution center. MacDermid also tests its clients waste streams, primarily plating bath solutions, for heavy metal content.

The only wastes generated on site are from small spills of its products and from the leftover samples from MacDermid's lab. Acid wastes from MacDermid's lab drain from the lab into a weir which then drains into Sunland's clarifier. The pH of the weir is constantly monitored on site and Sunland takes monthly samples. Sunland has a permit with the

L.A. County Sanitation District and the permit includes the use by MacDermid.

In 1988, MacDermid generated 9,800 pounds of hazardous waste. According to hazardous waste manifests the following hazardous materials were removed from the site in 1988: nickel sulfate, nickel chloride, tin-lead, chromic acid 16%, copper cyanide, sulfuric acid, cyanides 6%, sodium hydroxide, epoxy resins. Mr. Tice also gave a written list of the hazardous materials stored on site, including wastes and products. Hazardous wastes are stored on site for less than 90 days. In 1988, the wastes were removed at a frequency of approximately 8-10 times a year. Chemical Waste Management (EPA ID# CAT00646117) and Martin Industrial Pumping (EPA ID# CAD000628636) are the certified hazardous waste transporters which remove MacDermid's waste from the facility.

The following observations were made during the site reconnaissance visit:

The facility is roughly divided into the following areas: an office, a warehouse, a laboratory, and a shipping and receiving area. Massive volumes of MacDermid's products are stored in its warehouse. In the warehouse, 55-gallon drums and 5 to 10-gallon containers are stored at five different levels with the highest level approximately 75 feet above the floor. There is a high potential for the drums of product to fall from the higher levels and break open. The hazardous wastes at the site are stored on the floor in two separate areas inside the warehouse. Combined the two hazardous waste storage areas encompass approximately 200 square feet. The hazardous wastes are stored in 55-gallon drums and placed on wooden platforms. No concrete berms or other methods of secondary containment surround the hazardous waste storage areas.

The laboratory consists of one room with several Atomic Absorption spectrometers and spectrophotometers.

re/md/recon

CONTACT REPORT

AGENCY/AFFILIATION: Los Angeles Department of Water and Power		
DEPARTMENT: Water Quality		
ADDRESS/CITY: Los Angeles		
COUNTY/STATE/ZIP: Los Angeles, California		
CONTACT(S)	**TITLE**	**PHONE**
1. Jim King	Engineer	213-481-3151
2.		
E & E PERSON MAKING CONTACT: Robert Easley		**DATE:** 12/21/90
SUBJECT: Water use		
SITE NAME: MacDermid Incorporated		**EPA ID#:** CAD010707222

Well water from the San Fernando Basin is pumped to the North Hollywood Pumping Plant and is then blended with surface water in the North Hollywood sump. From the sump, water is pumped to the North Hollywood Reservoir and the Silverado Reservoir where it is distributed to people in Los Angeles. The City of Los Angeles provides drinking water to approximately 3.1 million people. Well water from the San Fernando Basin provides approximately 15% of the water for Los Angeles and water from Owens Valley and the Metropolitan Water District provides the rest.

APPENDIX B

PHOTODOCUMENTATION

FIELD PHOTOGRAPHY LOG SHEET

DATE: 10/18/90

TIME: 10:00 AM

DIRECTION:

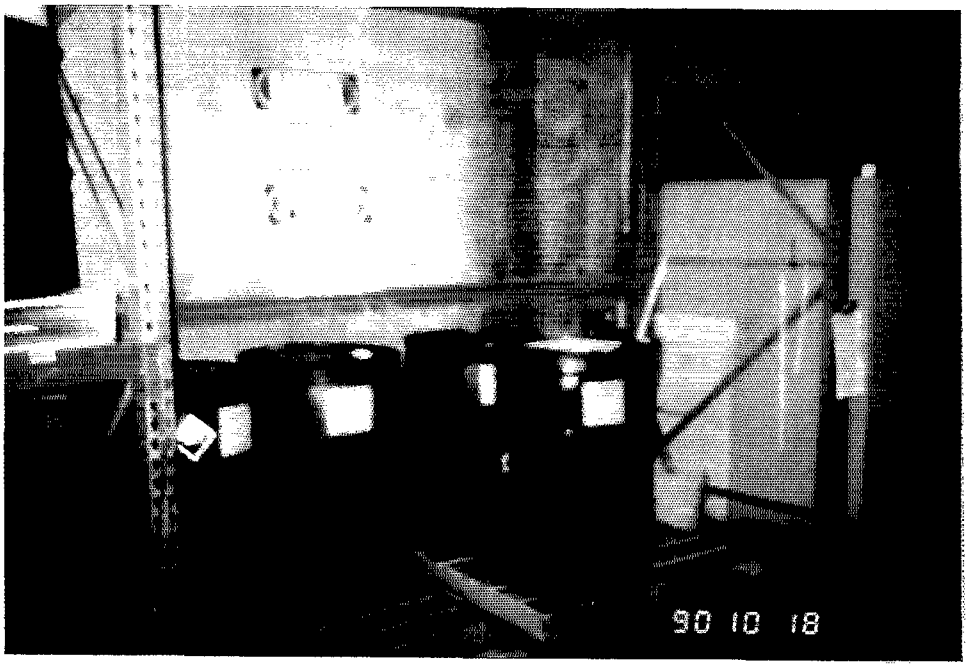
North

WEATHER:

Hot and Sunny

PHOTOGRAPHED BY:

Robert Easley



DESCRIPTION:

This is one of MacDermid's hazardous waste storage areas.

DATE: 10/18/90

TIME: 10:00 AM

DIRECTION:

West

WEATHER:

Hot and Sunny

PHOTOGRAPHED BY:

Robert Easley

DESCRIPTION:

MacDermid stores its products at five different levels in the warehouse.

re/md/fpls

FIELD PHOTOGRAPHY LOG SHEET

DATE: 10/18/90

TIME: 10:30 AM

DIRECTION:

West

WEATHER:

Hot and Sunny

PHOTOGRAPHED BY:

Robert Easley

DESCRIPTION

Taken from inside MacDermid's lab is a picture of some laboratory samples.

DATE: 10/18/90

TIME: 10:50 AM

DIRECTION:

East

WEATHER:

Hot and Sunny

PHOTOGRAPHED BY:

Robert Easley

DESCRIPTION

In the center of the picture is MacDermid's pH meter for the weir which leads to Sunland Chemical's clarifier.

re/md/fpls

DRAFT

CLOSURE PLAN

MACDERMID INCORPORATED
5439 San Fernando Road West
Los Angeles, California 90039

EPA ID #CAD 010707222

Submitted to:
Mr. Kenneth Hughes
Surveillance and Enforcement Unit
Southern California Section
Toxic Substances Control Division
Department of Health Services
107 South Broadway, Room 7011
Los Angeles, California 90012

Prepared by:

McKesson Environmental Services, Inc.
1252 Quarry Lane
Pleasanton, California 94566
(415) 426-2600

DRAFT

1.0 INTRODUCTION

MacDermid Incorporated (MacDermid) manufactures and distributes specialty chemicals for the metal finishing industry and printed circuit industry. The facility's name, address and EPA ID number are as follows:

MacDermid Incorporated
5439 San Fernando West
Los Angeles, California 90039

EPA ID #CAD 010707222

This facility serves as a warehouse and distribution center for specialty chemicals.

In 1981 the California Department of Health Services (CDHS) granted the facility Interim Status as a Storage Facility for recyclable materials. MacDermid's routine business practice with regard to these materials was to accept certain spent material for reclaiming, recycling and redistribution. Immediately upon receipt of the materials, MacDermid transferred them to a separate company on adjacent property, Sunland, for storage and/or processing. In addition, MacDermid stored small quantities of laboratory waste at the MacDermid facility. As part of the permitting process, CDHS requested MacDermid to submit an Operation Plan within a specified time period.

In 1982 CDHS exempted two of the three recyclable materials handled by MacDermid, spent chromic acid solutions and spent ammoniacal copper solutions, from the hazardous waste permitting requirements (Appendix A), but MacDermid did not relinquish its Interim Status. At this point MacDermid should have completed and submitted the Operation Plan because the facility still received one manifested non-exempt waste, spent solder strippers and solder conditioner materials, for immediate transfer to the company on the adjacent property. MacDermid neglected to complete and submit the Operation Plan, in large part because MacDermid did not intend to continue even this receipt and transfer, but was instead pursuing the acquisition of other property for storage prior to reclamation or transfer to a reclamation/recycling facility.

In 1985, EPA's finalization of its RCRA rules for "Hazardous Wastes Known as Recyclable Materials" negated the state exemptions for spent chromic acid solutions and spent ammoniacal copper solutions, subjected hazardous wastes that are recyclable to the requirements for generators, transporters and storage facilities under 40 CFR, and thereby made voidable the exemptions from the manifesting system and permitted waste transportation system that MacDermid and Sunland had previously obtained.

DRAFT

By December 31, 1985, the facility no longer received recyclable materials. There was no longer any need to use the warehouse as a storage or transfer facility because MacDermid's business practices had changed. The company had been reorganized in such a way that the Los Angeles premises were used only as a warehouse for distribution of products; a marketing agreement had been entered into whereby a company in Sante Fe Springs, Southern California Chemical Company (SCC), manufactured, recycled, and reclaimed the material; and spent chromic acid solutions were no longer recycled. Therefore, and in preparation for compliance with California Assembly Bill No.2166, MacDermid instructed its customers to manifest the material, use a permitted hauler, and ship the material directly to SCC, which is a TSDF with Interim Status.

MacDermid realized that even though it had not ever stored recyclable materials on its property and by 1985 did not even receive them, it was necessary under the RCRA regulations to change MacDermid's status from that of an Interim Storage Facility to that of Generator because of MacDermid's storage of laboratory waste. One requirement for this change of status would be a Closure Plan as required by California Administrative Code, Title 22, Article 23, Section 67210, even though recyclable material had never been physically stored on the premises. Subsequently, upon proceeding with the above, the CDHS then inspected the MacDermid site in February of 1986. MacDermid was cited for several violations. In response to the Notice of Violations, MacDermid sent to CDHS a Compliance Schedule, and has been and is taking the necessary steps to meet the schedule.

McKesson Environmental Services, Inc. (MES) has been retained by MacDermid to develop a proper Closure Plan for submission to the CDHS. This Closure Plan will describe the steps necessary to close the hazardous waste storage area in a manner that eliminates the need for further maintenance. This will be accomplished by ensuring that all hazardous waste and hazardous constituents are removed from the facility.

DRAFT

2.0 FACILITY DESCRIPTION

The MacDermid facility consists of a warehouse measuring approximately 200 feet by 100 feet. MacDermid leases the warehouse from Sunland Chemical (Sunland), which occupies the area immediately adjacent to the north and west of MacDermid's facility (A diagram of the site is shown in Fig. 2.0). MacDermid and Sunland entered into a business agreement whereby Sunland became a contract compounder for MacDermid. As part of MacDermid's business, certain products which are originally manufactured by MacDermid or its contract compounder are recycled/reclaimed.

Waste known as recyclable materials handled by MacDermid are as follows:

- -Spent chromic acid solutions;
- -Spent ammoniacal copper solutions;
- -Spent solder strippers and solder conditioner materials.

The waste materials received from MacDermid's customers were immediately transferred to storage and/or processing equipment on Sunland's property. The solder stripper/conditioners were stored in a 5,000-gallon tank. The chromic acid solution was placed in a 2,000-gallon lead-lined processing tank (this was the only material Sunland recycled - see letter dated June 4, 1982 to Sunland from CDHS attached). The ammonia etchant was stored in a 13,000-gallon tank (The containers are shown on Fig 2.0).

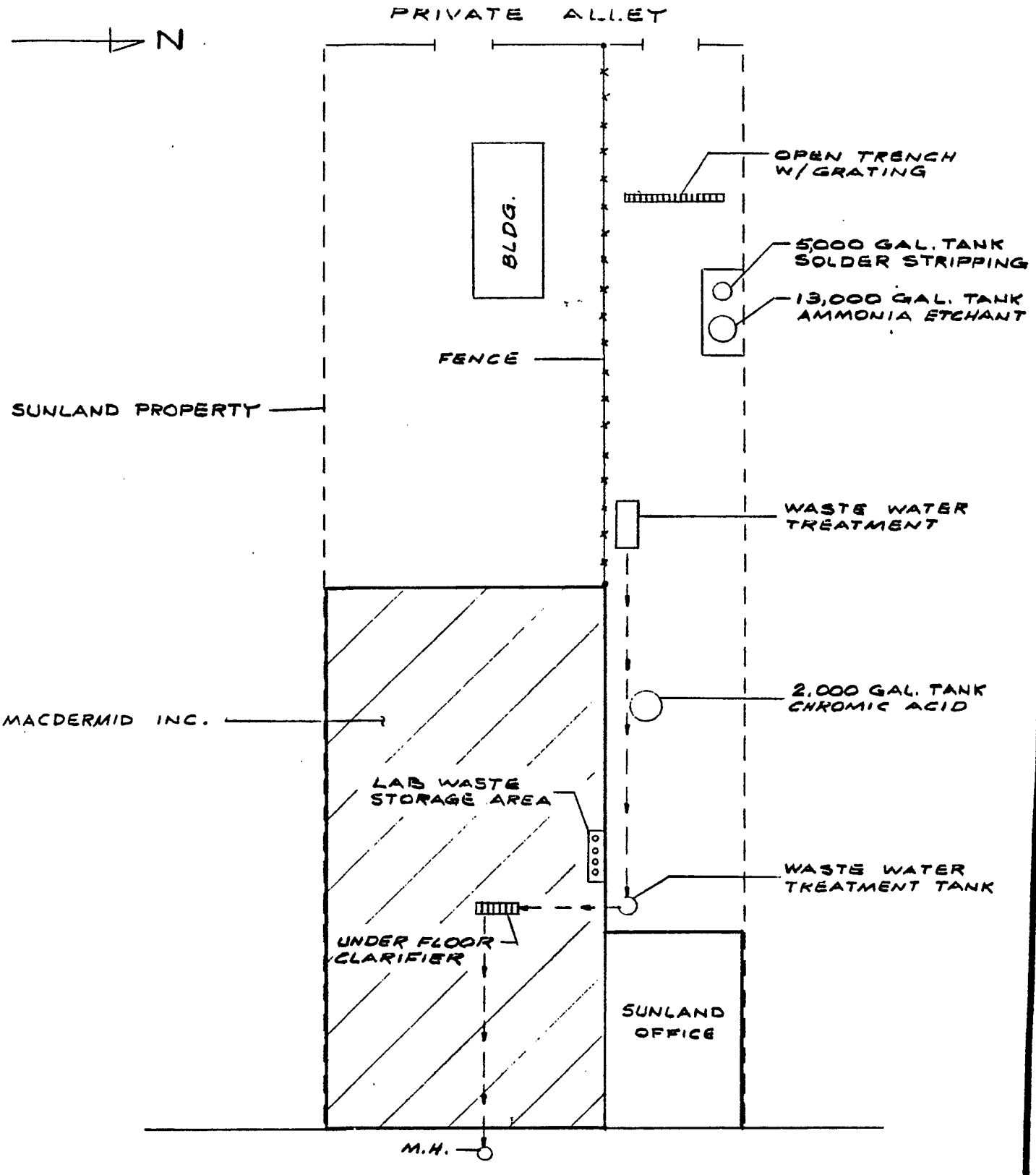
Laboratory wastes resulting from the testing of MacDermid's customer's nickel plating solutions, zinc plating solutions and other heavy metal plating solutions were stored on MacDermid's premises.

2.1 Current Facility Status

Hazardous waste received by MacDermid included the three types of spent chemicals specified in the above section. These wastes were stored for transhipment on Sunland's premises. Only the chromic acid solution was recycled at Sunland. Any and all remaining recyclable materials that remained on Sunland's premises after January 1, 1986 have been disposed of properly by using manifests and having the material transported to a TSDF. None of the three spent chemicals - chromic acid solution, ammoniacal copper solution, or solder stripper/conditioner material - were or are stored, treated or disposed of at MacDermid's warehouse.

The only waste material currently on the actual MacDermid premises are laboratory wastes which are disposed of in accordance with appropriate hazardous waste disposal methods, using manifests and being transported to an approved hazardous waste disposal facility.

AUTO WRECKING YA



McKesson

McKesson Environmental Services

MACDERMID INCORPORATED
5439 SAN FERNANDO RD. WEST
LOS ANGELES, CALIF. 90039

DRAWN BY: GS
CH'K'D BY:

NOV. 26, 1986

Fig. 2.0

SCALE: NONE

DRAFT

3.0 CLOSURE ACTIVITIES

Hazardous wastes other than the laboratory wastes noted previously have not been stored at MacDermid's facility. There are no hazardous waste constituents on this site which require removal or clean-up for closure of a Storage Facility; therefore, MacDermid considers this facility closed. MacDermid wishes to relinquish its interim status as a TSDF and revert to a simple generator status.

In order to assure that hazardous waste and hazardous waste constituents do not exist on MacDermid's premises under Storage for a TSD Facility, MacDermid will obtain a California Registered Engineer to visually survey the site and inspect the warehouse to verify the current status of the facility is as represented herein.

3.1 Closure Report

Upon completion of the engineer's inspection, a closure report will be prepared and submitted to CDHS. The report will contain the engineer's verification of the current status of the facility.

3.2 Certification of Closure

When closure is completed, certification by the owner and operator of the facility and by an independent registered professional engineer that the facility has been closed in accordance with the specification in the approved Closure Plan will be provided to CDHS.

NOTE: Chrome, copper and solder stripper/conditioner solutions referred to in this Plan as "hazardous wastes" were, prior to January 1, 1986, properly classified as "recyclable material". As indicated in the attached letters from CDHS, the material was exempted from the hazardous waste hauler and hazardous waste manifest system.

DRAFT

4.0 SCHEDULE

Upon approval of the Closure Plan by CDHS, the Plan will be implemented in accordance with the following schedule:

Days following CDHS Approval of Closure Plan	Activity
30 Days	Engineer's certificate provided to CDHS

DRAFT

5.0 COSTS

The costs presented below are the estimated costs for implementing this Closure Plan. These costs are based on the assumption that the facility status is as indicated in this Plan.

Closure Costs

- Site Survey	$ 600.00
- Closure Report	$ 1,000.00
TOTAL ESTIMATED CLOSURE COSTS	$ 1,600.00

DRAFT

APPENDIX A

Clayton Environmental Consultants, Inc.

1252 Quarry Lane • Pleasanton, California 94566 • (415) 426-2600

#7622-ES

April 8, 1987

Mr. John Hinton
Chief, Permitting Unit
Southern California Section
Toxic Substances Division
Department of Health Services
107 South Broadway, Room 7011
Los Angeles, CA 90012

RE: MacDermid, Inc. Closure Plan

Dear Mr. Hinton:

On December 14, 1986, Clayton (formerly McKesson Environmental Services) submitted a draft Closure Plan for the MacDermid, Inc. facility (EPA ID#CAD010707222) to your office, to the attention of Mr. Ken Hughs. This plan was the final item to be submitted in accordance with a compliance schedule approved by DOHS.

On April 4, 1987, I spoke with Mr. Hughs to determine the status of the Closure Plan. He informed me that the plan had been lost, and requested that another copy be submitted to your attention. Per that request, I have attached a copy of our original submission.

We look forward to receiving your comments concerning this plan. MacDermid wishes to implement the plan and resolve the matter as soon as possible.

Please let me know if you have any questions.

Sincerely,

Richard Fehler
Manager, Regulatory Affairs

cc: Ken Hughs, DOHS
Cherrie D. Gillis, MacDermid, Inc.

b:e731rf.ltr

McKesson Environmental Services, Inc.
1252 Quarry Lane, P O
Outside CA 800 227 131
Pleasanton CA 94566 Tel 415 426 2600 800 423 9081

McKesson

December 14, 1986 7622-ES

Mr. Kenneth Hughes
Surveillance & Enforcement Unit
Southern California Section
Toxic Substances Division
Department of Health Services
107 South Broadway, Room 7011
Los Angeles, CA 90012

RE: MACDERMID, INC. CLOSURE PLAN

Dear Mr. Hughes:

Attached is the draft copy of MacDermid's Closure Plan. As you know, finalization of the closure plan is the final item on MacDermid's compliance schedule.

Please let me know if you have any questions concerning this submission. I will be looking forward to receiving your comments.

Sincerely,

Richard Fehler
Manager, Regulatory Affairs

cc: Cherrie Gillis
MacDermid, Inc.
Anne Rogers
Nutter, McLennon & Fish
Julian Gresser
Nutter, McLennon & Fish

RF/kw
368

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
107 SOUTH BROADWAY, ROOM 7011
LOS ANGELES, CA 90012
(213) 620-2380

INSPECTION REPORT
on
MacDermid, Inc.
5439 San Fernando Road West
Los Angeles, CA 90039
(818) 240-9573

EPA ID # CAD 010707222

Inspected by : Carol Carollo

Report Prepared by : Javier Hinojosa

Date of Inspection : November 14, 1988

Date of Report : December 14, 1988

I. Purpose

To conduct a compliance evaluation inspection of a generator and a Treatment, Storage and Disposal Facility (TSD).

II. Representatives:

MacDermid, Inc.:

Bob Tice, Plant Manager

Beverly Easley, Office Supervisor

Department of Health Services/Toxic Substances Control Division (DHS/TSCD):

Carol Carollo - Associate Hazardous Materials Specialist

Javier Hinojosa - Hazardous Materials Specialist

III. Owner/Operator:

The MacDermid facility in Los Angeles is a regional office of the MacDermid Corporation, headquartered at 245 Freight Street, Waterbury Connecticut. The persons responsible for the management of hazardous waste generated at the facility are Robert Tice, Plant Manager and Beverly Easley, Office Supervisor.

IV. Background

1) October 15, 1975 - Facility began operating.

2) November 10, 1981 - DHS/TSCD issued facility an Interim Status Document (ISD).

3) January 14, 1986 & February 21, 1986- A generator and TSD inspection of the facility was conducted by DHS/TSCD inspector Ken Hughes. Fifteen Class I/II generator and TSD violations were found.

4) April 16, 1986 - DHS/TSCD issued facility a Notice of Violation (NOV) for violations discovered by Hughes inspection.

5) December 14, 1986 - Facility submitted a draft TSDF closure plan to DHS/TSCD. This plan was either lost or never received by DHS/TSCD.

6) April 10, 1987 - Facility submitted a second copy of the draft closure plan to DHS/TSCD.

7) June 11, 1987 - A generator and TSD inspection of the facility was conducted by DHS/TSCD inspector Teena Mizunoe. The facility was found in violation of twelve Class II counts.

8) June 22, 1987 - A follow-up inspection of the facility was conducted by DHS/TSCD inspector Teena Mizunoe. Facility was found in compliance.

9) September 15, 1987 - DHS/TSCD -Financial Responsibility Unit issued facility an NOV for failing to provide liability coverage and financial assurance for closure cost.

V. General Description of Facility:

The MacDermid facility consists of administrative offices, a quality control laboratory, and a warehouse. (See attachment 1). The facility
is presently considered a TSD and a generator. However, the facility has initiated closure procedures in order to become solely a generator.

VI. Hazardous Waste Activity Description:

MacDermid currently generates primarily two waste streams, laboratory waste and floor waste. The lab wastes consist of samples that MacDermid's clients send in for testing such as nickel, tin/lead, chromic acid, electroless copper and cyanide plating solutions; and acid zinc chloride solution and palladium chloride activator solutions. These wastes are generated after the clients' samples have been analyzed and the samples are no longer needed. The floor waste is generated from MacDermid's currently on-going clean-up project. It is currently conducting a thorough clean-up of the facility's warehouse area. This waste stream is made up of copper, nickel, and lead solution.

Prior to 1986, MacDermid received manifested recyclable materials from its customers. These wastes were taken to either Sunland Chemical or other recyclers (such as CP Chemical) after receipt at MacDermid's facility. MacDermid claims that it has not stored hazardous waste for greater than 90 days, nor did it treat or dispose of the recyclable materials on-site. MacDermid also claims in its closure plan that the recyclable materials were never stored on-site, but were "...immediately transferred to storage and/or processing equipment on Sunland's property".

VII. Potential Violations:

COUNT 1: Title 22, California Code of Regulations (Cal. Code Regs.), section 66471. Hazardous Waste Determination Requirement for the Generator.

Two-five gallon containers with dark residues were found in the hazardous waste storage area behind 55-gallon drums of fluoroboric acid (see attachment 3; photo # 1). In addition, a five gallon container with several three-quarter liter bottles containing unidentified residues was found near the fire storage cabinets (see attachment 3, photo # 2).

COUNT 2: Title 22, Cal. Code Regs., section 66508 (a) (2). Accumulation Time for the Generator.

Two 55-gallon drums of fluoroboric acid waste and one drum of cyanide waste were not marked with accumulation start dates.

COUNT 3: Title 22, Cal. Code Regs., section 67105 (d) (1). Personnel Training.

Facility did not have recorded the names of each person filling each position related to the management of hazardous waste.

COUNT 4: Title 22, Cal. Code Regs., section 67141 (c) and (f). Content of Contingency Plan.

Contingency Plan did not describe arrangements agreed to by local authorities to coordinate emergency services pursuant to section 67126 nor did it contain an adequate evacuation plan.

COUNT 5: Title 22, Cal. Code Regs., section 67124. Required aisle space.

Facility did not maintain sufficient aisle space to allow unobstructed movement between hazardous materials and hazardous waste (see attachment 3, photo # 2).

VIII. OBSERVATIONS:

On November 14, 1988, at approximately 1330 hours, DHS inspector Carol Carollo and I arrived at the MacDermid facility. We met with Bob Tice, the Plant Manager.

We began the inspection by discussing the facility's operations, what waste streams it generates and how it managed those waste streams. Details are listed in Section IV. Tice stated that the facility was currently undergoing some renovations which included the painting of the office areas and a thorough floor cleaning of the warehouse area.

We proceeded with the review of the facility's records. In our review the following records were found in the conditions indicated as below:

a) Manifests - Manifests for 1986, 1987, and 1988 were reviewed and found to be properly completed with the exception of a single manifest. Uniform Hazardous Waste Manifest (UHWM) # 874560674 had a discrepancy in the designated TSD EPA ID number that was caught by the designated TSD. Land Disposal Restriction (LDR) notifications were found to be attached with some of the manifests.

b) Inspection Logs - Facility was found to keep an adequate inspection log of the hazardous lab waste storage area.

c) Training Records - Facility could not provide for review the necessary records. Tice states that he was unfamiliar with the availability of the records, since he was recently appointed to this facility. I told Tice to produce a copy that if the records became available and forward it to DHS/TSCD. On November 16, 1988, the DHS/TSCD received a copy of these records. These records did not include all the necessary information. (See attachment 4).

d) Contingency Plan - Plan did not include an adequate evacuation plan.

e) Biennial Reports - Biennial Reports from 1985 and 1987 appeared to be adequate.

f) Financial Assurance (FA) - Documentation provided appeared to be adequate.

g) Closure Plan (CP) - A draft of the CP was later reviewed in the office and found to appear adequate.

We proceeded on a walk through of the facility with Tice. In the hazardous waste storage area, I observed approximately ten drums. I noticed that there were two partially filled 55 gallon drums labelled as fluoroboric acid that were not marked with accumulation start dates. As we inspected this area, Carollo discovered two five-gallon containers containing dark residues which Tice was unable to identify. The containers were stored in the back of the storage area, behind the fluoroboric acid drums (see attachment 3, photo # 1). In addition, I observed inadequate aisle space in the hazardous lab waste storage area. (See attachment 3, photo # 1).

A few feet away from the hazardous waste storage area, by the fire storage cabinet, I observed a five gallon container with some trash and several three-quarter liter containers with dark residue sediments (see attachment 3, photo # 2). Upon questioning Tice as to the contents of this container, he stated that this container was not a trash can and that employees must have mistaken it for one. Tice stated that the three-quarter liter containers were temporarily placed there before being triple rinsed and then disposed of properly.

As we continued our walk-through of the facility, we noted no other deficiencies.

IX. Discussion With Management

In concluding the inspection, I discussed with Tice the violations noted in Section IV. I told him to forward to me all records that were unavailable for review during the inspection, and that I would be sending him a Report of Violations for all deficiencies found.

X. Attachments

1. Map of Facility - one page.
2. Surveillance and Compliance Report dated 11-14-88 - one page.
3. Photographs from November 14, 1988 Inspection - one page.
4. Training Program - eleven pages.
5. Checklist - pages.

X. SIGNATURES:

Javier Hinojosa
Hazardous Materials Specialist

12/14/88
Date

Paul M. Baranich, Program Supervisor
Surveillance & Enforcement Unit
Region 3 (Los Angeles)
Toxic Substances Control Division

12/14/88
Date

INSPECTION REPORT

MacDermid, Inc.
5439 San Fernando Road West
Los Angeles, CA 90039

RCRA Non-Major
CAD010707222

Inspected By: Teena Mizunoue
Date of Inspection: June 11, 1987
Date of Report: July 10, 1987

I. Purpose

The purpose of this inspection was to conduct the annual treatment, storage, and disposal (TSD) facility and generator inspections.

II. Representatives Present

Cherrie D. Gillis, Compliance Administrator, MacDermid, Inc.
Teena Mizunoue, Hazardous Materials Specialist, Dept. of Health Services (DHS)
Robert M. Senga, Associate Hazardous Materials Specialist, DHS
Rick Jones, Hazardous Materials Specialist, DHS

III. Facility Description

The MacDermid facility consists of administrative offices, quality control laboratory, warehouse, and hazardous waste storage area. The facility is presently considered a TSD and generator. However, the facility is initiating closure procedures in order for it to become just a generator.

The MacDermid facility leases its space from the Sunland Corporation. MacDermid does not do any manufacturing nor does it treat, dispose, or store hazardous waste. MacDermid is mainly a warehouse of fresh chemicals for its customers. Most of its customers are those involved in the printed circuit board industry. Therefore, their stock consists of acids, alkalis, a few cyanides, and a few flammable materials too. The MacDermid facility also operates a service lab which analyzes its customers' samples. The samples are analyzed so that the customer can determine if they can still make use of a bath or chemical. The MacDermid warehouse also contains an underground clarifier. However, MacDermid does not own this clarifier. The clarifier is the property of the Sunland Corporation whom MacDermid leases the warehouse from.

The last annual TSD inspection was conducted on February 21, 1986 by Ken Hughes of the DHS. From that inspection, fifteen (15) violations of the California Administrative Code (CAC) were found and a notice of violation (NOV) was issued. The facility responded with a compliance schedule (Attachment 8) that outlined each violation, its course of remediation, and completion date. The company submitted their TSD closure plan on December 14, 1986. This initial closure plan was received by Ken Hughes of the DHS. According to Mr. Hughes, the first closure plan was misplaced and a second copy submitted to the Department on April 10, 1987. This second copy was forwarded to the permitting unit of the DHS for review and approval.

IV. Waste Streams and Waste Management

The only waste stream that MacDermid currently generates is laboratory wastes. These lab wastes consist of the samples that MacDermid's customers send to them for testing. The lab wastes are generated after the customers' samples have been analyzed and the sample is no longer needed. The facility stores the discarded samples in compatible 55 gallon drums for less than ninety (90) days. The drums are properly labelled including accumulation date and stored in a small storage area on top of wooden pallets in the northeast corner of the warehouse. The drums of lab waste are forwarded to Chemical Waste Management for metal recovery and disposal.

Prior to 1986, MacDermid received manifested recyclable materials from its customers. These wastes were taken to either Sunland Chemical or other recyclers (such as CP Chemical) after receipt of the waste. It appears as though MacDermid acted as a transfer station for these recyclable materials. MacDermid claims that it did not store for greater than 90 days, treat, or dispose of the recyclable materials on-site.

V. Inspection Observations

Both generator and TSD inspections were conducted with the completion of both types of checklists. A record review and facility walkthrough were done too.

A. Record Review

Numerous record/paperwork violations were found as the TSD and generator checklists were evaluated. These numerous violations were due to the fact that MacDermid presently has no one at the Los Angeles facility who exclusively handles the RCRA regulated aspects of the company. The RCRA aspects of the facility were previously handled by James Tunnicliff, who left the company about six months ago. According to Ms. Gillis, when Mr. Tunnicliff left no one was informed about or put in charge of the various RCRA related records.

Therefore, most of the records were misplaced (when the office was cleared) and she was unable to locate them before this inspection was conducted.

The following records were not available for review: Inspection program and records, personnel training program and records, contingency plan, and annual and biennial reports. Ms. Gillis informed us that MacDermid has submitted a closure plan to the DHS in order to close down the TSD aspect of the facility. She also stated that the DHS has told MacDermid that they need not file a revised Part A application until their closure is acted upon. During the record review, manifests for the years 1985, 1986, and 1987 were looked at and were found to be in order.

B. Facility Walkthrough

Before conducting the walkthrough inspection, I (Teena Mizunoue) asked Cherrie Gillis if pictures could be taken inside the facility. Ms. Gillis spoke with the company Vice President of Sales who said no. We were first shown the administrative offices where the typical office equipment and business offices were located. We then walked into the quality control laboratory. This lab is shared by both MacDermid and the Sunland Corporation. The lab contained various analytical equipment and chemicals. After walking through the lab, we toured the warehouse area.

The warehouse consisted of six rows of five level high metal shelves with various chemicals on them. The area was well maintained and free of obstructions. Forklifts were easily maneuvered around the warehouse. On the western side of the warehouse was a loading dock area with roll down doors. Just north of the loading dock area were six (6) pallets of twelve (12) carboys each of chromic acid carboys. According to Ms. Gillis and a warehouseman, the carboys had been sitting at the facility for at least five (5) months. Ms. Gillis informed us that the chromic acid carboys are rinsed out by the customers before they are returned to MacDermid for deposit. However, this situation couldn't be detected by just looking at the dusty carboys. It was suggested that MacDermid's customers label the carboys with the statement that they are rinsed out and empty. Ms. Gillis stated that she would contact MacDermid headquarters to determine what could be done with the empty carboys.

Adjacent to the empty carboys were two-165 gallon containers of unused nickel solution. Ms. Gillis stated that the nickel solution didn't meet the specifications of a customer. Therefore, it was being kept there until another buyer could be found or the company made a decision on what to do with it.

We then proceeded to the northwest corner of the warehouse where the hazardous waste storage area was located. The storage area consisted of three-55 gallon drums which were atop wooden pallets. The drums were properly labelled with accumulation date and all other waste identification information. A single 55

gallon drum of a labelled hazardous waste was located over ten (10) feet above the warehouse floor and near the edge of its shelf. I informed Ms. Gillis that all drums of hazardous waste must be maintained to prevent the possibility of the drum rupturing. I requested that the drum on the second shelf be brought down to the warehouse floor. Ms. Gillis stated that the drum would be lowered later today. Ms. Gillis also informed us that the drums of hazardous waste are not stored longer than ninety (90) days. This schedule is adhered to reagardless of how full the drums are by the 90 day limit. The drummed wastes are picked up by Chemical Waste Management for metal recovery and disposal. Attached to the shelf in the hazardous waste storage area was a hazardous waste storage area inspection sheet/log. According to the log, the hazardous waste storage area is inspected weekly for leaks, drum condition, labels, etc.

Also located in the northeast corner of the warehouse were numerous shelves of customer samples. These samples were in plastic containers and were being kept until they became outdated (expired beyond shelf life) or they were no longer needed for quality control of the customer's chemicals/baths. Some of the bottles of samples were dented but not ruptured or leaking. Ms. Gillis stated that she planned to have any outdated samples or dented bottles discarded as hazardous waste as soon as possible.

In the floor adjacent to the sample and hazardous waste storage areas was an underground clarifier that belonged to the Sunland Chemical Company. The clarifier was operating and being monitored by a pH meter which was located above the clarifier plate covers.

The emergency eyewash and shower (located on the eastside of the warehouse and outside the quality control lab) weren't tested due to the mess it might cause on the warehouse floor and Ms. Gillis wasn't sure if they were connected to an alarm system. It was recommended that the safety equipment be checked at a later date to determine if it's operable.

The inspection tour was concluded and we proceeded back to the meeting room.

VI. Violations

The following record violations were found:

1. Section 67104 California Administrative Code (CAC) - No copy of the inspection plan/schedule was available at the facility for review.

2. Section 67105 CAC - No copy of the personnel training program/records were available for review at the facility.

3. Sections 67140, 67141, 67142, 67143 CAC - No copy of the contingency plan was available for review at the facility.

4. Section 67164 (a) CAC - No inspection, contingency, and training plans were available for review at the time of the inspection.

5. Section 67144 CAC - No emergency coordinator has been designated at the facility.

6. Section 67165 CAC - No copies of the annual report were available for review at the time of the inspection.

7. Section 67101 (b) CAC - No copy of the ISD was on file at the facility.

8. Section 66492 (b), 66493 - No copies of the biennial report were on file at the facility.

The following violation was found during the facility walkthrough tour:

1. Section 67243 (b) - A single 55 gallon drum of hazardous waste was located over ten (10) feet above the warehouse floor and near the edge of the shelf. The drum could possibly fall and rupture.

All of the above violations were summarized in the inspection compliance report that was written at the end of the inspection (Attachment 5). A copy of the compliance report was given to Cherrie D. Gillis.

VII. Discussion with Management

All of the violations cited in Section VI were discussed with Ms. Gillis. She believed that the various records that weren't available for review here, did exist in her files at MacDermid's headquarters in Connecticutt. Ms. Gillis stated that she would mail copies of the missing records to me and to the Los Angeles facility for on-site maintenance. Ms. Gillis felt that these records were at the facility, but she had no idea of their location. As mentioned before, the facility's RCRA program is in turmoil since the coordinator position is vacant due to the resignation of Mr. Tunnicliff.

I discussed with Ms. Gillis the need for designating an emergency coordinator. She said one would be designated and I would be notified as soon as possible. I stressed to Ms. Gillis that the single 55 gallon drum of hazardous waste located above the warehouse floor must be lowered to the warehouse floor in order to prevent it from rupturing. She said that she would have this done later today.

As to the chromic acid carboys, Ms. Gillis stated that she would contact MacDermid headquarters about their removal. She also stated that she will be initiating the proper disposal of any expired or no longer needed customer samples. She also stated that she would check on the operating status of the emergency eyewash and shower through consultation with John Fowler of MacDermid. Ms. Gillis believed that Mr. Fowler might have already tested the emergency equipment the last time he was at the Los Angeles facility.

Ms. Gillis was handed the written compliance report to read, sign, and make a copy of.

We left the MacDermid facility at 1245 hours. Three pictures were taken of the outside of the facility (Attachments 6 & 7) prior to our departure from the site.

VIII. Conclusions

From this inspection it was discovered that the MacDermid, Inc. facility (currently classified as a TSD and generator) was in the process of going through closure with respect to its TSD classification. They had originally submitted their closure plan to the DHS on December 14, 1986 and then resubmitted it on April 10, 1987 due to the plan being misplaced. At this time, the closure plan is still pending review by the DHS permitting unit.

Despite the initiation of closure procedures, the annual TSD and generator inspections were conducted. Ms. Gillis of MacDermid was informed that the facility was still considered a TSD and must still meet those requirements until they are made a generator only. Ms. Gillis was under the impression that MacDermid had to only meet generator requirements at this time. We instructed her that if they met the TSD requirements, then their transition to generator status would be easier. Ms. Gillis was also told that once MacDermid becomes a generator, it could request a variance to store its hazardous waste for greater than 90 days. This was suggested so MacDermid could prevent the disposal of less than full drums of hazardous waste.

The MacDermid facility had numerous record violations. This was due in part to the non-existence of an individual who handles the RCRA aspects of the facility. When the previous RCRA coordinator left, his office was cleared and some of the paperwork from there was misplaced. This facility has a real need for a person to take over the RCRA regulation of the facility. However, no one at the facility wants this responsibility.

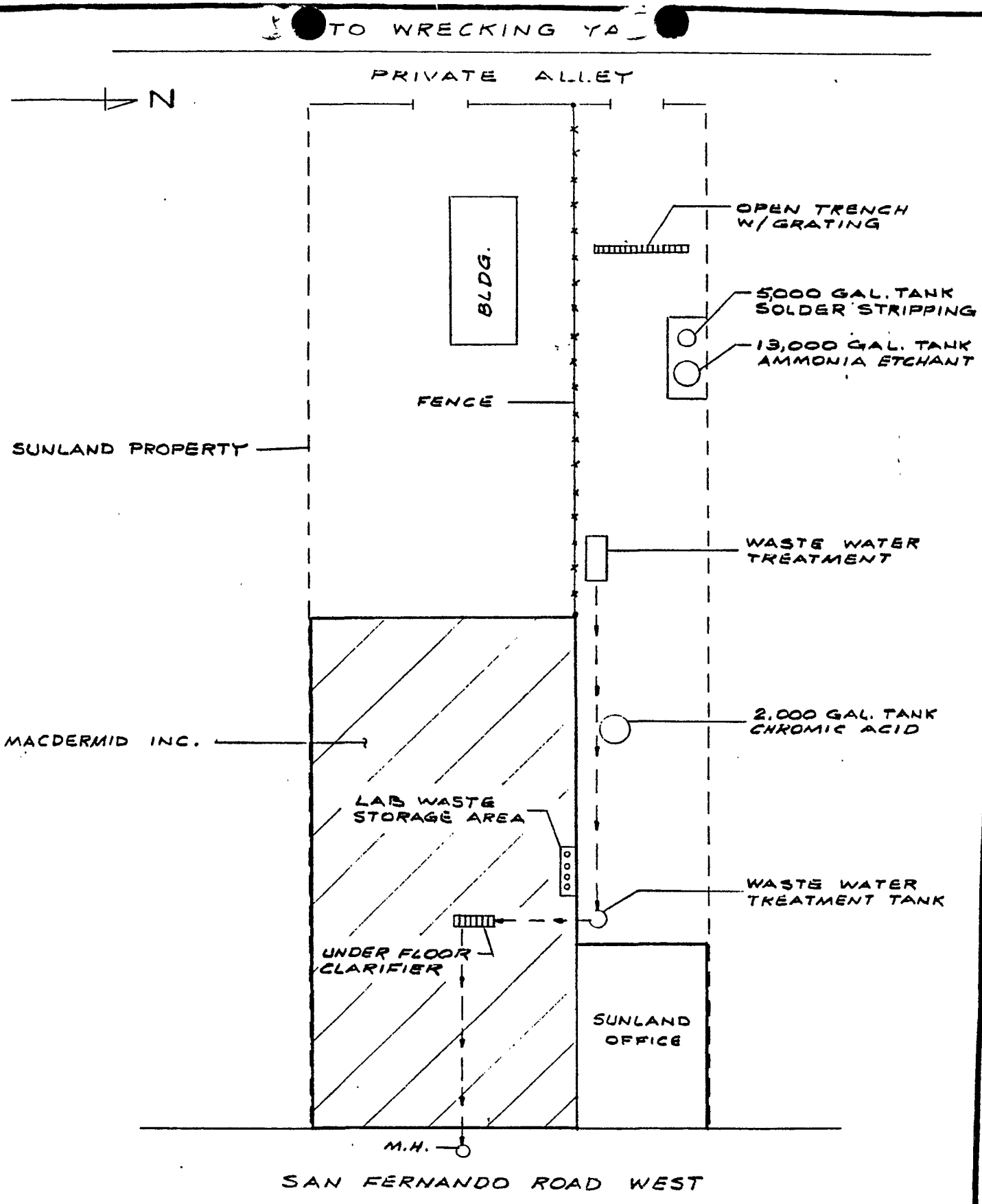
This MacDermid facility will be in compliance with TSD and generator requirements once all of the violations listed in Section VI are corrected and confirmed by a follow-up inspection. From this inspection it was found that MacDermid was just a generator of hazardous waste. The facility currently does

not treat hazardous waste on-site, store hazardous waste for greater than 90 days, store hazardous waste from off-site, and dispose of hazardous waste on-site. These four factors are the basis for MacDermid submitting a closure plan to the DHS in order to have its status changed from a TSD and generator to a generator only.

IX. Attachments

1. Map of Facility
2. TSD Checklist
3. CMELs
4. Generator Checklist
5. Compliance Report
6. Photo Location Map
7. Photographs
8. Compliance Schedule from 1986 Inspection

Attachment 1



McKesson McKesson Environmental Services	MACDERMID INCORPORATED 5439 SAN FERNANDO RD. WEST LOS ANGELES, CALIF. 90039 DRAWN BY: GS CH'K'D BY:	NOV. 26, 1986 Fig. 2.0 SCALE: NONE